



Oregon

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U.S. Fish and Wildlife Service
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RE: Docket No. FWS-HQ-ES-2018-0097

The Oregon Department of Fish and Wildlife (Department) appreciates this opportunity to provide comment on the US Fish and Wildlife Service's (Service) proposal to delist the gray wolf from the Federal Endangered Species Act (ESA) in the lower 48 states. Although the proposal covers much of the continental United States, the Department's comments will focus on Oregon and other states to a lesser extent.

The Department manages gray wolves in Oregon according to the Oregon Wolf Conservation and Management Plan (Plan). Where federally listed, the Department works with the Service on wolf recovery following the Oregon Federal/State Coordination Strategy. The Service aims to assist the Department in its successful implementation of the Plan. This strategy and Plan are coordinated efforts directed at the recovery of wolves in Oregon with a goal of removal of the gray wolf from federal ESA protection.

The Service's proposal is accurate in many statements and assumptions regarding Oregon policy, Plan, and commitments to wolf conservation and recovery. We offer the following specific comments:

- Based on intensive wolf monitoring in Oregon, the Department agrees that wolves in Oregon are an extension of the metapopulation of wolves in western Canada and the Northern Rocky Mountains (NRM) (p 30-31).
- Oregon continues to see an increase in the number of established wolf groups and packs in the federally listed portion of Oregon. We fully expect this expansion to continue regardless of listing status as we have documented increasing numbers, packs and breeding pairs where they are not currently listed in the eastern third of Oregon.
- The Service proposal states that Oregon is "committed to conserving wolves as demonstrated by development of management plans and laws and regulations that protect wolves" (p 42, 51). The Department agrees with this statement and the Service's assumption of continued commitment to gray wolf conservation in Oregon (p 42) is accurate. Long-term commitment to wolf conservation has already been demonstrated in Oregon with the classification of gray wolves in statute as a special status game mammal, increased penalties for illegal take, an established wolf-livestock compensation program, and the Department having a dedicated wolf coordination staff, trained biological field staff, and a current budget request for additional staff.

- The Department agrees that the shift in public attitudes from the time of gray wolves extirpation to present recovery has resulted in a social climate that will indeed continue to persist (p 42).

The Department agrees that state wildlife agencies, including Oregon, have trained staff to disseminate information about wolves and wolf management to the public (p 53). In fact, Oregon Department staff greatly outnumber Service staff and have demonstrated the ability to educate and inform the public on wolf conservation and management. The Oregon Plan includes chapters devoted to information reporting and education (Oregon 2010).

- The assumption that wolf populations in Oregon will be managed to ensure progress toward recovery objectives while also minimizing livestock losses is accurate (p 55, 140).
- The Service proposal accurately states that Oregon is committed to continuing necessary biological and social research and outreach and education to maintain healthy wolf populations (p 132).

Clarifications:

- The current proposed Oregon draft plan does not establish any minimum population thresholds (p 55): a population of 300 was a value used for modeling and text has been modified (ODFW 2019, p 17).
- Plan description (p 112-114) is accurate with one clarification: legal controlled harvest of wolves is allowed under Phase III of the 2010 plan (Oregon 2010, p 36) and any proposed hunt requires Commission approval through a public process (Oregon 2019, p 31).

The Department feels the potential threats identified and evaluated in the Service's proposal are appropriate because most match the potential conservation threats identified in the Oregon Plan. The Plan requires the Department to diligently monitor and manage threats. Based on empirical data and a viability analysis, these threats are not having a significant impact on the Oregon population. Therefore, we expect increases in wolf numbers and distribution to continue throughout Oregon.

The Service's proposal points out the Department has already devoted significant resources toward wolf monitoring efforts and the Plan directs monitoring strategies (p 153). This Department commitment to wolf monitoring in Oregon would most likely meet or exceed post-delisting monitoring requirements.

The Department is in strong agreement with the Service's assessment that the five factors are not sufficient imminence, intensity, or magnitude to indicate that wolves are in danger of extinction or likely to become so within the foreseeable future in Oregon. Based on the information presented in the Service's proposal, it is likely the same is true for areas outside Oregon considered in this proposal.

Following our Plan, the Department has been working diligently toward and in preparation for federal delisting and is currently situated to become the primary wildlife agency responsible for wolf conservation and management statewide. Wolves in western Oregon are currently managed under protections in Phase I of our Plan

which provide protections similar to what would occur under the Oregon ESA. Therefore, few changes would occur following federal delisting.

Given the Service's proposal's evaluation and supporting content of the five factors to assess listing and the Department's commitment to our Plan and long-term conservation of wolves in our state, the Department supports the Service's determination that the gray wolf in the lower 48 United States and Mexico (except the Mexican wolf subspecies) no longer meets the definition of an endangered or threatened species under the federal ESA.

The Department looks forward to continued work with the Service on recovery of wolves in Oregon and implementation of the Oregon Wolf Conservation and Management Plan.

Sincerely,



Curtis E. Melcher
Director

Citations:

Oregon Department of Fish and Wildlife 2010. Oregon Wolf Conservation and Management Plan. Salem, OR USA.

Oregon Department of Fish and Wildlife 2019. Oregon Wolf Conservation and Management Plan (Draft Update April 2019). Salem, OR USA.

https://www.dfw.state.or.us/Wolves/docs/oregon_wolf_program/Draft_Wolf_Plan_4-12-19.pdf